

1 to?

2 A Yes, it sticks out in my mind, yes.

3 Q Did you think that "My Favorite Things"
4 addressed issues of importance to the local community?

5 A Yes, I think so. I mean, "My Favorite
6 Things" if I'm remembering this right was a program
7 where he would bring in leaders from the community and
8 have a nice chat with them, kind of humanize them.
9 Find out from them. Kind of like a Desert Island,
10 this kind of program. I think our listeners -- I
11 mean, I was really curious to find out what the
12 director of the symphony -- they didn't have MP3
13 players back then, but I suppose it would have been --
14 what's in your CD changer now.

15 It was fascinating to hear that, like, so
16 the director of the symphony has Rolling Stones in the
17 CD player, that's pretty cool. He never asked me to
18 be on the show.

19 Q You just needed to stay there longer.
20 Your turn would have come. What issues of local
21 importance would you say that that program generally
22 addressed?

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1 A Oh yes, I think it was connecting our
2 listeners with leaders in the community who they
3 otherwise would only kind of be aware of in the
4 abstract. I'm trying to remember the symphony
5 director's name, because he was quite a high profile
6 person in our town.

7 But I think that type of service, that
8 type of programming is the type of programming that
9 really, one, caused our station to be distinct from
10 the other Public Radio stations, and two, engaged
11 listeners at a level that they just weren't being
12 engaged anywhere else.

13 When I think of -- it's kind of a given in
14 Public Radio that you measure the public service that
15 you're imparting to a great degree in a scientific
16 way, in a numeric way, by the number of people who are
17 listening to the radio station. I mean, that's the
18 only apples to apples comparison.

19 I mean, yes, I think that anecdotal
20 information that someone heard someone talking about
21 the station in line at the grocery, and they said that
22 they really didn't like the show or they liked the

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1 show, but there's numeric evidence in listener
2 estimates that I can then use to say that, look, we're
3 providing a public service.

4 I mean, the station had over a hundred
5 thousand listeners. That's pretty good. So yes, I
6 thought that that type of programming was important to
7 our listeners.

8 Q Did there come a time when you learned
9 that Mr. Farley hosted Performing Arts Special?

10 A I don't remember anything with that
11 specific title, but I mean, it was part of Alan's
12 interview cycle to bring in people who were in the
13 Performing Arts, like symphony, like theatre, like a
14 ballet.

15 Q When you were talking about the public in
16 terms of "My Favorite Things," was that a call in
17 show?

18 A No, that was pre-recorded, in the best
19 case scenario, sometimes live.

20 Q Did there come a time when you learned
21 that Mr. Farley hosted a program called "AIDS Update?"

22 A Yes, that was one of Alan's main shows or

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1 he spent a lot of time on that program. I mean, it
2 meant a lot in San Francisco at the time.

3 Q I take then you learned that fairly early
4 on that the "AIDS Update" program was --

5 A Yes, I think it's one of the things that's
6 actually listed in the program schedule.

7 Q You listen to "AIDS Update?"

8 A Yes, I can remember listening to the
9 program, and again, it would have been one of those
10 programs that was on the air at the time that I would
11 had the radio on in my office just in the background.

12 Q That was a live program?

13 A It could have been live or it could have
14 been also pre-recorded. I mean, my preference was
15 always to pre-record because you can edit and make it
16 sound better later on. But you can't always make
17 everything pre-produced. Sometimes live is the only
18 way you can talk.

19 Q Was the "AIDS Update" program a call in
20 program?

21 A I don't remember it being a call in
22 program.

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1 Q So the format generally would have been
2 Mr. Farley interviewing a guest or two?

3 A Yes, or providing his own update or report
4 on things he had read or information he had
5 researched. It's kind of one of these programs where
6 the content kind of is self-evident in the title.

7 Q So in terms of issues of local importance,
8 it would be fair to say that the "AIDS Update"
9 involved a public health issue, if nothing else?

10 A Oh, for sure.

11 Q Did there come a time when you learned
12 that Mr. Farley hosted a program called "Open Air?"

13 A Yes.

14 Q And you learned that fairly early on?

15 A Yes, "Open Air" was already on the air at
16 the station on a weekly basis. In fact, that was
17 probably one of the first programs I ever listened to
18 at the station, because it had a distinct San
19 Francisco sound because it featured fine arts,
20 interviews with local authors

21 That was one of the programs that was
22 involved in a major program change at the station,

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1 because I expanded that program to a daily program,
2 expanded it to an hour so that we could cover even
3 more fine arts.

4 Talk to local authors, talk to authors out
5 on tour, and then feature more of the local arts and
6 culture at length on the station.

7 Q Mr. Farley would host the program all the
8 time, even after it went to a daily program of an hour
9 length?

10 A No, we had -- there were two producers
11 involved in that program, Alan Farley helped produce
12 it. Michael Johnson helped produce it. Then there
13 were the volunteer producers like the kind that are
14 listed in the program guide would help produce the
15 program, either record a segment or produce a segment
16 or do a short interview that would air as part of the
17 program.

18 Q Mr. Farley basically had overall
19 responsibility for the program though?

20 A The way I saw the program was that Alan
21 Farley was the host, and Michael Johnson was the
22 Production Manager of the show. So in a way that when

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1 I was producing programming at KPBS, I had my hosts
2 and then I was the producer, I would fill in as best
3 as possible when they couldn't host the program.
4 But that's the way that I saw the program produced.

5 Q And it went from a weekly program to a
6 daily program fairly early on in your tenure?

7 A No, I don't remember making the change
8 immediately. I think I waited until we were in the
9 new station, just because it -- to start something up
10 like that in the old station, considering it was in a
11 gymnasium. It's something that I wanted to wait until
12 we were in the new station.

13 Q Now what issues of importance to the local
14 community would "Open Air" deal with?

15 A Again, I mean, it would have been very
16 similar to "My Favorite Things." That in San
17 Francisco, of all the cities in the U.S., has a very
18 vibrant arts and culture community. The Public Radio
19 term I'd use is "Fine Arts." I was trying to create
20 a distinct kind of personality for the station from
21 the other Public Radio stations in the market.

22 So to the degree that, in the San

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1 San Francisco market we had KQED, which was pretty high
2 powered news and information all the time, in depth
3 reporting, investigative pieces, KALW didn't have the
4 resources to do that kind of reporting. There was the
5 Pacifica Station in the market.

6 Generally, one is kind of a progressive,
7 a grassroots community oriented station. We had a
8 full-time jazz station, jazz 24 hours a day.

9 So I really needed to create a distinct
10 brand or personality for the station, and the path
11 that I decided to take was, we can't throw out the NPR
12 program or Morning Edition, because that's where we
13 build our audience.

14 So I focused on fine arts because to my
15 ear, there wasn't any other radio station in town that
16 was covering important issues in the arts, like the
17 survival of the opera, the symphony going bankrupt,
18 the plays coming through town.

19 I mean, again, arts and culture is an
20 important part of people's lives in San Francisco. It
21 may not be that case in other cities, but in San
22 Francisco, for sure. People take the issues in the

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1 arts and culture pretty seriously. So I don't know if
2 that got to your question.

3 Q It did. Did it ever come to pass that you
4 asked Alan Farley to prepare material for inclusion in
5 KALW's Public Inspection File relative to the programs
6 that he hosted?

7 A I don't remember ever asking Alan to do
8 that.

9 Q Considering that his programming had
10 addressed issues of local importance, can you explain
11 why you didn't ask Mr. Farley to prepare material for
12 inclusion in the public inspection file?

13 A It's not that I don't remember not asking
14 him. I don't remember ever asking. I mean, in my
15 testimony I talk about the one producer who I do
16 remember, because I want to be accurate about who I'm
17 remembering specifically.

18 I do remember asking John Covell, the host
19 of "City Visions" or the producer of "City Visions" to
20 create lists. I just don't remember ever asking Alan
21 in particular to create any list for the file.

22 Q Well, one of the reasons why I'm going

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1 through this questioning is perhaps to trigger a
2 memory on your part that you may or may not have
3 actually asked some of the individuals that I'll be
4 talking about, the first of which is Mr. Farley, and
5 if it didn't, it didn't.

6 A Yes.

7 Q Did there come a time when you met Rose
8 Levinson?

9 A Yes, Rose was the acting General Manager
10 before I started, and I did meet with her early on.

11 Q About how early on was it, within the
12 first month?

13 A Yes, I'm pretty sure it would have been
14 within the first month. I don't remember exactly when
15 it was.

16 Q At the time you met her, I take it you
17 were aware that she had been the previous General
18 Manager?

19 A Oh yes.

20 Q During your tenure as General Manager,
21 about how often would you interact with Rose Levinson?

22 A Not regularly, maybe I interacted with her

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1 less than five times my whole time there. She would
2 come in in the evenings to host "City Visions," so
3 again, we wouldn't cross paths.

4 Q You generally would be out the door and
5 gone before she would show up?

6 A Yes.

7 Q To the extent you had a relationship with
8 her, how would you describe it?

9 A It was good. I think she was support --
10 I think, I know she was supportive. It's one of these
11 things where you have to have been manager of that
12 station to be able to relate to someone else who is
13 manager of that station.

14 Q So you could swap manager war stories, if
15 nothing else?

16 A I don't know if it was war stories, it was
17 more just like commiseration.

18 Q Well, what would she share with you about
19 her tenure as General Manager?

20 A I mean, it was stories about the
21 difficulties in moving the station along or making new
22 things happen at the station. I mean, again, that

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1 kind of relates to the earlier response that kind of
2 involved how the station is staffed through the Civil
3 Service system in San Francisco. It was very hard to
4 hire new people to do new things.

5 I mean, any general manager or program
6 director who goes into a new station has their ideas
7 about, "I want to do this. I listened to the station
8 and I think we can improve in this area."

9 But you go into a situation where you have
10 people who have been doing what they've been doing for
11 as long as they've been doing it, and then you have
12 your ideas, "Okay, I think we should do things
13 differently to improve the station's service."

14 There's the struggle between, okay,
15 they're comfortable doing what they're doing, and you
16 want to do something different. We could both share
17 those kind of experiences. Whether they were
18 successful or we failed at doing what we thought we
19 wanted to do with the station. So we would talk about
20 those types of things.

21 Q Did there come a time when you learned
22 that she hosted "City Visions?"

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1 A Yes, that came early on, yes.

2 Q But almost the same time essentially that
3 you knew that she was the prior General Manager?

4 A I mean, I probably learned that she was
5 the General Manager before I learned that she was the
6 host of "City Visions." But it would have been pretty
7 evident -- I think it's in the program guide that
8 she's listed as the host of the program. So it would
9 have been one of the self-evident, okay, Rose is the
10 host of "City Visions."

11 Q Now you had come from what, San Diego went
12 to San Francisco?

13 A Yes, I had been working at KPBS TV and
14 radio in San Diego.

15 Q How much time did you have to get settled
16 in San Francisco before you actually started to work
17 at KALW?

18 A I moved into my apartment August 1st. I
19 think I started August 4th or 5th at the station.

20 Q Prior to that time, did you have the
21 opportunity to listen to KALW or basically you didn't
22 have a chance to listen to the station until you

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1 actually moved to San Francisco?

2 A I mean, I listened to the station when I
3 had come up for the interview. I think I would travel
4 to San Francisco just before that period, just -- and
5 out of Public Radio curiosity, just listen to the
6 stations in the market from time to time when I was in
7 the area. I mean, not thinking that I was going to be
8 working there.

9 I do remember when I first moved up, the
10 station was again, on in my apartment all the time
11 just to familiarize myself with the station.

12 Q I take it you listen to the "City Visions"
13 program then?

14 A Yes, I would listen to it.

15 Q And you listened to it before the 1997
16 Renewal Application was filed?

17 A Yes.

18 Q You thought that "City Visions" addressed
19 issues of local importance to the public, to the
20 community?

21 A "City Visions" is branded as a news and
22 public affairs program, and they would cover important

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1 political election issues, municipal issues, the
2 city's economy, yes.

3 Q Now did you ever ask Rose Levinson to
4 prepare material for the public file?

5 A No, not directly.

6 Q Was there any particular reason why you
7 asked Mr. Covell instead of Ms. Levinson, given that
8 she was, I think, what, the more superior person of
9 the two with respect to the "City Visions" program?

10 A No, John was the producer of the program.
11 I mean, I didn't -- I don't think I ever distinguished
12 that asking one or the other would produce anything
13 different.

14 Q Now there did come a time when you met Mr.
15 Covell?

16 A Yes.

17 Q Approximately how long were you at the
18 station before you met Mr. Covell?

19 A I don't remember how long I had already
20 been there by the time I met John.

21 Q That was within the first couple of
22 months?

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1 A I don't remember. I thought I knew John
2 pretty well by the time the License Renewal
3 Application process had started. John again, as the
4 producer of the program, from time to time, he would
5 come into the station during the daytime and stop by
6 my office and say hi. He's a very professional,
7 reliable kind of guy. I just don't remember when I
8 first met him.

9 Q During your tenure as General Manager,
10 about how often would you interact with John Covell?

11 A He probably stopped into the station once
12 every week or two or I would cross paths with him
13 there at the station.

14 Q How would you describe your relationship
15 with John Covell?

16 A It was good. I think John knew that my
17 background at KPBS was as a producer, producing public
18 affairs and news programming. So to the degree that
19 I was one of the people at the station who we could
20 again, share stories and talk about what it's like to
21 produce a program. I enjoyed those conversations with
22 him. We clicked -- it's just a better way to put it.

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1 Q Did it ever come to pass that you asked
2 John Covell to prepare material for inclusion in
3 KALW's Public Inspection File relative to "City
4 Visions?"

5 A Yes.

6 Q Approximately when did you do that?

7 A It would have been -- it certainly was
8 during the -- when I was completing the License
9 Renewal Application. So it would have been before
10 when we submitted it. I mean, if I had to place it in
11 a particular month, it would have been sometime in
12 June or July when I asked him to do that.

13 Q About how long after you became General
14 Manager did you meet Ricardo Esway?

15 A I don't know who that is.

16 Q That name means nothing to you?

17 A No.

18 Q If I were to tie him to a program called
19 "The Commonwealth Club of California," would that
20 trigger a memory as to who Ricardo Esway was?

21 A No, I know the program now, but I don't
22 know the name.

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1 Q About how long after you became General
2 Manager did you meet Martin Nemko?

3 A I can remember meeting Marty soon after I
4 started at the station.

5 Q During your tenure as General Manager,
6 about how often would you interact with Mr. Nemko?

7 A Maybe once a month.

8 Q How would you describe your relationship
9 with Martin Nemko?

10 A I got along well with Marty. Marty hosted
11 -- he and his wife hosted a weekly program to talk
12 about workplace issues, which I enjoyed listening to
13 because it was a call in program. People would call
14 in about problems they were having at work.

15 Q Would you call in?

16 A No, I never called in. I thought that was
17 important for -- I mean, I could hear the program, and
18 people were calling in with as much passion and with
19 as much pleasure, I suppose, as people would call in
20 to a program like "Car Talk," and I thought, work on
21 itself may not seem like a great and very interesting
22 issue. But these two people, the host of the program

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1 really make it a compelling program.

2 So I don't remember if his program had a
3 name. I think -- yes, I don't remember if it had a
4 name. But I wanted to bring it to a greater awareness
5 with our listeners. So it's one of the programs that
6 I worked with Marty to give it a name, and we started
7 calling it "Work with Marty Nemko." I think we
8 heightened its promotion in our program guide to draw
9 listeners' attention to it. But he was good to work
10 with.

11 Q Yes, I think the initial name as I see it
12 here is "School and Career Talk with Marty Nemko." So
13 you shortened the name of it, made it a little more
14 punchy, and it became "Work with Marty Nemko?"

15 A Yes.

16 Q So you were directly involved in the
17 schedule change for Martin Nemko's program?

18 A Yes, I don't remember if it was
19 necessarily a schedule change or if it was just tweak
20 to the program and refined it. Yes, I don't remember
21 if it was already airing where it eventually started
22 airing.

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1 Q I think you mentioned though expanding the
2 program or was I mishearing?

3 A Yes, I mean, to the degree -- well, maybe
4 expanding kind of is a synonymous term with making it
5 better, refining it, covering a wider range, although
6 if it was called "School and Career Talk," and now
7 we're talking about work only. But it did expand the
8 range.

9 I think necessarily when it was the old show it
10 wasn't necessarily about workplace issues in general.
11 But it was kind of more oriented toward school issues
12 and career, what I want to do with my career.

13 But they really hit it off when they would take
14 calls from people wanting advice about, "what do I do
15 about this at work?" So that's what happened to the
16 show.

17 Q So this sounds like a program that you
18 listened to with some frequency before the '97 Renewal
19 Application was filed?

20 A Yes, I remember it was one of those kind
21 of programs, that when I was out doing my chores,
22 driving around on a Saturday morning, I could listen

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1 to it at my own convenience.

2 Q Did it ever come to pass that you asked
3 Martin Nemko or anyone else involved in the production
4 of this program to prepare material for inclusion in
5 the public inspection file?

6 A I don't remember.

7 Q Given your apparent relationship with Mr.
8 Nemko and your views of the worth of the program, why
9 didn't you ask him to prepare material for inclusion
10 in the public inspection file?

11 A It's not that I don't remember not asking
12 him, I just don't remember in the same distinct way
13 that I remember asking John Covell to produce a list.
14 I just don't remember ever asking Martin.

15 Q Did there come a time after you became
16 General Manager when you met Chuck Finney?

17 A Yes, I remember Chuck.

18 Q About how long after you became General
19 Manager did you come to learn that Chuck Finney was
20 host of a program called "Your Legal Rights?"

21 A It was soon after.

22 Q During your tenure as General Manager,

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1 about how often would you interact with Chuck Finney?

2 A I probably interact with Chuck about as
3 regularly as I interact with Marty Nemko.

4 Q How would you describe your relationship
5 with Chuck Finney?

6 A It was good. I would actually meet --
7 Chuck would come in very early to prepare for his
8 program. So we, in fact, would cross paths every now
9 and then. Yes, I had a good relationship with him.

10 Q Did you listen to the program, "Your Legal
11 Rights?"

12 A No, not regularly.

13 Q We lawyers are too boring?

14 A Well, I mean, it wasn't necessarily as
15 compelling a program for me to listen to as the "Work"
16 program.

17 JUDGE SIPPEL: Are you testing credibility
18 here?

19 MR. SHOOK: It may be a little hard to
20 decipher at this point, but there is a method to this
21 madness.

22 BY MR. SHOOK:

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1 Q I take it though that you understood --
2 you had the belief that "Your Legal Rights" covered
3 issues of importance to the local community?

4 A Oh, yes.

5 Q Did it ever come to pass that you asked
6 Chuck Finney to prepare material for inclusion in
7 KALW's public inspection file?

8 A Again, like with Marty Nemko and Alan
9 Farley, I don't have a distinct memory of asking Chuck
10 to accrue the list. Which again, isn't to say that I
11 didn't ask, I just don't remember in the same way that
12 I remember working with John Covell.

13 MR. SHOOK: Now if I could indulge your
14 kindness here, if you could place before Mr. Ramirez
15 SFUSD Exhibit 55, beginning at page two.

16 THE WITNESS: Okay.

17 MR. SHOOK: Now to give you some context
18 to the questions that I'll be asking. You may want to
19 review to yourself briefly the declaration for Mr.
20 Finney that appears on page one of SFUSD Exhibit 55.

21 JUDGE SIPPEL: Go off the record while
22 he's reading that.

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1 (Whereupon, the above-entitled matter went
2 off the record at 11:22 a.m. and resumed at 11:23
3 a.m.)

4 BY MR. SHOOK:

5 Q Mr. Ramirez, starting at page 2, there are
6 a series are documents that bear the title "Your Legal
7 Rights Program Information," and the first one of
8 these documents that appears on page 2 concerns a
9 program that was aired Wednesday, November 6, 1996
10 from 7:30 to 8:00 in the evening.

11 The question that I have for you with
12 respect to this sheet as well as to the sheets that
13 follow, up to and including page 51 is have you ever
14 seen these information sheets before, which apparently
15 Mr. Finney prepared?

16 A No, I don't remember ever seeing these
17 before.

18 Q Did you ever ask Chuck Finney, either
19 directly or through someone else, to create a document
20 for placement in the KALW public inspection file?

21 A No, I don't remember that.

22 Q Did there come a time when you met William

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1 Helgeson?

2 A Yes.

3 Q Approximately how early on in your tenure
4 as general manager did you meet him?

5 A I imagine I met Bill my first day on the
6 job.

7 Q What generally did Mr. Helgeson do during
8 your tenure as general manager?

9 A I considered Bill my, or the station's
10 operations manager. So my expectations were that Bill
11 was responsible for the day-to-day kind of activities
12 at the station. For instance, day-to-day, including
13 the program log, that's placed into the studio each
14 day that tracks what the station is doing from minute
15 to minute, hour to hour. Say for instance, doing the
16 daily report, program reporting schedule and then the
17 requisite filing or -- filing for this.

18 Basically, taking the tapes and putting
19 them in the right box really, for the right day of the
20 week that the program is supposed to air. Day-to-day
21 also necessarily including, like we discussed earlier
22 scheduling as the announcers -- as we needed them.

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